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RICHARD W. WILKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

FUZZYSHARP TECHNOLOGIES
INCORPORATED,

Plaintiff,

vs.

SONY COMPUTER ENTERTAINMENT
AMERICA INC.,

Defendant.

Civil Action No.

**COMPLAINT FOR PATENT
INFRINGEMENT AND DEMAND
FOR JURY TRIAL**

NOW COMES Plaintiff, FUZZYSHARP TECHNOLOGIES INCORPORATED
("FST"), through its attorneys, and files this Complaint for Patent Infringement and Demand for
Jury Trial against Sony Computer Entertainment America Inc. ("Sony"). In support thereof,
Plaintiff FST states as follows:

JURISDICTION AND VENUE

1. This is an action for patent infringement of United States Patent No. 6,172,679 (hereinafter “the ‘679 Patent”), and United States Patent No. 6,618,047 (hereinafter “the ‘047 Patent”) pursuant to the laws of the United States of America as set forth in Title 35 Sections 271 and 281 of the United States Code.
2. This court has subject matter jurisdiction over this action pursuant to 28 U.S.C. Sec. 1338(a) and 28 U.S.C. Sec. 1331.
3. Venue is proper in this judicial district under 28 U.S.C. § 1391(d) and 1400 (b) because Defendant Sony has committed acts of infringement in this Federal District.
4. Plaintiff FST, is a corporation organized under the laws of the State of Texas.
5. On information and belief, Defendant Sony is a Delaware Corporation, and has a corporate office at 16530 Via Esprillo, San Diego, CA 92127.

INTRADISTRICT ASSIGNMENT

6. This is an action for Patent Infringement, which is an excepted category under Civil L.R. 3-2(c). Pursuant to Civil L.R. 3-2(c), this action is assigned on a district-wide basis.

CAUSES OF ACTION FOR PATENT INFRINGEMENT

7. On January 9, 2001, the ‘679 Patent entitled “VISIBILITY CALCULATIONS FOR 3D COMPUTER GRAPHICS”, was duly and legally issued to Hong Lip Lim, as the sole patentee.
8. The ‘679 Patent is assigned entirely to Plaintiff FST
9. Plaintiff FST is the sole owner of the ‘679 Patent, and has standing to bring this action.
10. On September 9, 2003, the ‘047 Patent entitled “VISIBILITY CALCULATIONS FOR 3D COMPUTER GRAPHICS”, was duly and legally issued to Hong Lip Lim, as the sole patentee.

1 11. The '047 Patent is assigned entirely to FST.

2 **COUNT ONE**

3 12. Plaintiff FST, repeats and incorporates herein the allegations contained in
4 paragraphs 1 through 11 above.

5 13. Defendant Sony is engaged in wilful direct, and/or indirectly infringement of at
6 least one claim of the '679 Patent pursuant to 35 U.S.C. § 271(a) at least by
7 selling, and offering to sell Graphic Processors Units capable of performing
8 occlusion culling during the computer graphics rendering process.

9 14. Plaintiff previously sued Sony on November 16, 2009, thereby providing good
10 notice of patent infringement to Sony and Sony has willfully continued its patent
11 infringement.

12 **COUNT TWO**

13 15. Plaintiff, FST, repeats and incorporates herein the allegations contained in
14 paragraphs 1 through 11 above.

15 16. Defendant Intel is engaged in direct, and/or indirect infringement of at least claim
16 1 of the '0479 Patent pursuant to 35 U.S.C. § 271(a) at least by selling, and
17 offering to sell Graphic Processors Units capable of performing occlusion culling
18 during the computer graphics rendering process.

19 17. Plaintiff previously sued Sony on November 16, 2009, thereby providing good
20 notice of patent infringement to Sony and Sony has willfully continued its patent
21 infringement.

JURY DEMAND

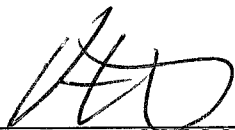
18. Pursuant to Fed. R. Civ. P. 38, Plaintiff hereby demands a jury trial as to all issues in this lawsuit.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests this Court to:

- a. Enter judgment for Plaintiff on this Complaint for the Defendant;
- b. Order that an accounting be had for the damages caused to the Plaintiff by the infringing activities of the Defendant;
- c. Award Plaintiff additional damages due to willful patent infringement;
- d. Award Plaintiff interest and costs; and
- d. Award Plaintiff such other and further relief as this Court may deem just and equitable.

THE PLAINTIFF
FUZZYSHARP TECHNOLOGIES
INCORPORATED



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